

Paul W. Shakespear (14113)
Cameron Cutler (15116)
Natalie Beal (18311)
SHELL & WILMER L.L.P.
15 West South Temple
Suite 1200
Gateway Tower West
Salt Lake City, Utah 84101
Telephone: 801.257.1900
Facsimile: 801.257.1800
Email: pshakespear@swlaw.com
ccutler@swlaw.com
nbeal@swlaw.com

Abram I. Moore (*pro hac vice*)
Christian A. Zazzali (*pro hac vice*)
K&L GATES LLP
70 West Madison St., Suite 3100
Chicago, IL 60602
Telephone: 312.781.6010
Facsimile: 312.827.8000
Email: abe.moore@klgates.com
christian.zazzali@klgates.com

Attorneys for Plaintiff Eric Schiermeyer

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC,

Defendants,

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A GALA GAMES,

Nominal Defendant.

**NOTICE OF SUPPLEMENTAL
EXHIBIT RE: MOTION TO
FREEZE ASSETS, FOR AN
ACCOUNTING, AND FOR
EXPEDITED DISCOVERY AND
MEMORANDUM IN SUPPORT
AND REQUEST FOR IMMEDIATE
HEARING [ECF No. 9]**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielson

Magistrate Judge Daphne A. Oberg

Plaintiff Eric Schiermeyer (“Plaintiff”), derivatively and on behalf of Nominal Defendant Blockchain Game Partners, Inc. (“Company”), submits the attached Exhibit A to clarify and supplement the relevant record on Plaintiff’s Motion to Freeze Assets, for an Accounting, and for Expedited Discovery and Memorandum in Support and Request for Immediate Hearing [ECF No. 9] (“Motion”). Plaintiff submits the attached Exhibit A to provide the Court with an updated trace report from Kroll, dated September 7, 2023, explaining Defendants’ efforts to obscure the transfer and location of the Stolen Gala. The Court may review Exhibit A hereto in place of reviewing Exhibit A to the Motion, which is an earlier report by Kroll, dated August 28, 2023 [ECF No. 9-3].

Dated: September 11, 2023.

SNELL & WILMER L.L.P.

/s/ Paul W. Shakespear

Paul W. Shakespear
Cameron Cutler
Natalie Beal

K&L GATES LLP
Abram I. Morre
Christian A. Zazzali

Attorneys for Plaintiff Eric Schiermeyer